

UNITED STATES OF AMERICA  
DISTRICT OF MASSACHUSETTS

CRIMINAL NO.: 04-10336

UNITED STATES OF AMERICA  
v.  
SANTIAGO ET AL.

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**DEFENDANT JOSE TORRADO'S RENEWED MOTION FOR MODIFICATION OF HIS CONDITIONS OF RELEASE**

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Now comes the defendant, JOSE TORRADO and renews his motion for modification of his release conditions by removing the electronic monitoring and replace it with one weekly report in person at pre-trial services and once by telephone. In alternative, Mr. Torrado asks this Court to extend the time in which he can be off bracelet until 9:00 p.m. Mr. Torrado has been completely compliant with all conditions the Court and has kept and maintained a job.

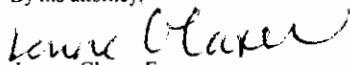
Without the electronic monitoring, Mr. Torrado will be able to play a more active role in child rearing. As it is now, his wife Lillian Morales works until 7:00 p.m. on Monday through Friday. (See letter from Lawrence Dental Center, Attachment A). Jose now may be home by 6:00 p.m., so he has taken care of them in his own residence at 32 West Street, Apt. 2, Lowell, MA 01851. However, the landlord, Jorge Tabon does not want him to continue to have the children there. (See affidavit of Lenore Glaser attached to Attachment B).

When this motion was previously filed, then Assistant United States Attorney had opposition. She noted that the pretrial officer did not oppose it. (Her submission is attached here as Attachment C). The current Assistant United States Attorney is concerned that the timing of the request is close to the time of an expected plea and likely jail time. In fact the

is a renewal of a motion that was filed much earlier. Mr. Torrado, for that reason, wants the opportunity to be with his wife and children as much as possible. He has already shown substantial ties in the community and has been successful in his supervised release.

WHEREFORE : The defendant prays that this Court grant the modification.

Respectfully submitted,  
JOSE TORRADO  
By his attorney,



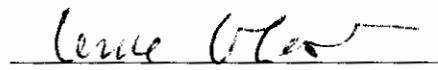
Lenore Glaser, Esq.

Lenore Glaser, Esq.  
25 Kingston Street, 6<sup>th</sup> Floor  
Boston, MA 02111  
(617) 753-9988  
BBO #: 194220

Dated: September 22, 2005

**CERTIFICATE OF SERVICE**

I, Lenore Glaser did mail a true copy of this motion to William Bloomer, AUSA, Christopher Wylie , Pretrial Services Officer, and Jose Torrado on September 22, 2005,

  
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Lenore Glaser